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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	Case No. 3:05-cr-61-RRB
)	
Plaintiff,)	
)	SENTENCING MEMORANDUM
v.)	
)	
CELINA R. THOMPSAN,)	
)	
Defendant.)	
_____)	

Comes Now the United States of America, by and through counsel, and submits this Sentencing Memorandum.

This is a strange case. This is a strange defendant. Rarely does the government encounter a defendant who orders \$347,865 worth of school merchandise for a non-existent school. PSR, ¶ 55.¹

What renders the case somewhat more comprehensible is the fact that

¹ However, the Total Combined Loss is computed to be \$340,745.49. PSR, ¶ 71.

defendant has a criminal history, with six criminal history points, “establishing a criminal history category of III.” PSR, ¶ 89.² With a total offense level of 20, the advisory sentencing range is 41 to 51 months.

RECOMMENDATION

The government recommends a sentence at the low end of the range, 41 months, restitution in the amount of \$278,189.71 (PSR, ¶ 134), no fine, and a three year period of Supervised Release (PSR, ¶ 121).

In light of Dr. Wolf’s “preliminary finding of Dissociative Disorder”, mental health counseling is recommended. PSR, ¶105.

RESPECTFULLY SUBMITTED this 6th day of March, 2006, at
Anchorage, Alaska.

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s/Crandon Randell
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CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2006
a copy of the foregoing was served
via electronically to: Kevin McCoy

s/ Crandon Randell

² There apparently remains an outstanding warrant for defendant out of Johnson County, Wyoming. PSR, ¶ 85a.